

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

# 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-11

JUN 0 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RACO, IIC. HARVEY HUSSELE, INC. P.O. BOX 4002 HISHAWAKA, IN 46755

Re: Wayne Reclamation and Recycling ("Site") Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCIA).

In accordance with the requirements of Section 104(b) of CERCIA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCIA, undertake the remedial action itself and, under Section 107 of CERCIA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCIA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCIA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCIA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCIA and other laws. In accordance with Section 107(a) of CERCIA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- O Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and
- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCIA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCIA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- a demonstration of the PRPs' capability to finance the RD/RA;

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCIA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief

De fle

Remedial and Enforcement Response Branch

### Enclosures

cc: Sheila Huff, DOI
Doug Fisher, IDEM
Tom Mariani, DOJ
Patrick Ralsdon, IDNR
Environmental Defense Section, DOJ
Indiana Attorney General
Dan Sparks, USFW

#### ATTACHMENT I

- A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.
- B. The current PRP Group has conducted the following studies and/or activities at the Site.
  - 1. 1986 Removal Action removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
  - 2. Remedial Investigation to determine the nature and extent of contamination at the Site.
  - 1988 Removal Action conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
  - Feasibility Study to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.
  - 5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
  - 6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.
- C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

#### ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

# CURRENT WRR PRP GROUP STEERING COMMITTEE

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A RESIDEN

William N. Hall Breed, Abbott & Morgan 1875 Eye Street, N.W. Washington, D.C. 20006 (202)466-1118

Christopher J. Dunsky Honigman Miller Schwartz and Cohn 2290 First National Building Detroit, Michigan 48226 (313) 256-7872

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Wayne Waste Oil Site List of PRB The Secret Second Notice Letter 10 Feb 1890 LI	THE UP THESE LABELS PLEASE! THEY ARE FOR UP THESE LABELS PLEASE! THEY ARE FOR UP THESE LABELS PLEASE! THEY ARE FOR	8 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
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6 900116 E.R. CARPENTER 195 COUNTY NOAD 15 SOUTH P.O. BOX 2366 ELKMART, IM_46515	CELOTER CORP. P.O. BOI 157 LAGRO, IM. 46941	S 900116 L.M. CARRIDE 4420 CLUBVIEW DRIVE FORT MATHE, IN 46804
9 900116 ERIE STOWE BOAD 500 ERIE STOWE ROAD HUNTIMGTOM, IM_46750	10 900116 RIESE CORP. 303 WATER STREET LOGAMSPORT, IM_46947	CEMPRAL STEEL 5 WERE CO. C/O PREMTICE-NALL CORP. SYSTEM CIRCLE TOWER BUILDING IMDIANAPOLIS,IM_46204
12 900116 FILLIAM J. FRANKE, PRESIDENT FRANKE PLATING WORKS, INC. 2109 E. WASHINGTON BOULEVARD FORT WARNE, IN 46714	13 900116 PRICTION MATERIALS 1049 SABINE . RENTINGTON, IN 46750	
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96 900116 STRAUSS, INC. P.O. BON 149 NORTH MANCHESTER, IN 46962	43 900116 REITH RILEY CONSTRUCTION P.O. BOX 477 GOSHRW, IM_46526	40 900116 PRECISION PIRCE PARTS 712 SOUTH LAGON RISHAMARA, IN_46544	37 900116 ##COM PASTRMERS P.O. BOX 6100 ST. JOE, IM_46785	34 900116 #IP\$CO 232 50. TAIN STREET GOSHEN, IN_46526	31 900116 MORTHERN INDIANA MANUFACTURING 105 5. THAVEN BOURDON, IV. 46504	20 900116 MCGILL MFG. 705 M. 6TH STREET MOMTICELLO, IN_47960	25 900116 RRIZMAN 1141 E. 12TH STREET HISMANARA, IN_46584	ST CONTOSO) 201 S. THOMAS ROAD PORT WAYNE, IN_4680A
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54 900116
WARNER 6 SONS CONTRUCTIONS
29099 U.S. HIGHWAY 33 W
ELKHART, IN\_46516

57 900116 A. HATTERSLEY 6 50H P.O. BOX 5366 3939 HOBILE AVEUUE PORT WAYNE, IN\_86895

60 900116 ALECTRICO, INFO 55800 CORRANT ROAD P.O. BOX 690 HISHAWAKA, IN\_45544

63 900116
ANOCO OIL COMPANY
200 E. RANDOLPH DRIVE
CHICAGO, IL\_60601

66 900116
HARTHA RUBELLS HOYER
SR. ATTORNET, AND PIPELINE CO.
500 REBAISSANCE CRUTER
C/O ONE HOODAND AVE.
DETROIT, HI\_48.263

69 900116 ASHLEY WARD, INC. 56883 BLEMARY COURT ELKHARY, IM 46916

72 90/2116
BASTIAN PLATING CO., INC.
625 W. 15TH STREET
AUBURN, IN\_467/26-2133

TRUMBALL 5 SONS P.O. BOX 87 LARWILL, IN\_46764

52 900116 UNITED YOOL P.O. BOX 1352 ELKHART, YM\_46575

55 900116 WEIL-MCHAIM DIVISION OF MARLET CO. BLAINE STREET MICHIGAN CITY, IN\_46360

58 900115
ACTIVE PRODUCTS CORP.
BERDERT A. SPITZER, JR.
ATTORNET AT LAW
P.O. BOX 927
HARIOU, IA\_46852

61 900116
GARY CROUTS
ALUMINUM COMPANY OF AMBRICA
1501 ALCOA BUILDING
PITTSBURGS, PA\_15219

64 900116
ANACOMPA POWER CARLE COMPANY
BAST BIGHTH
HARION, IN\_46952

APOLLO DISPOSAL P.O. BOK 410 AMGOLA, IM\_46703

70 900116 AUSTIN PETROLEUR 99 2. JOE STREE! HUNTINGTON, IN\_46750

73 9001 6 JOHN BARCOT 130 E. SUTTENFIELD FORT WAYNE, IN\_4680 3 47 900116 TEM RURBER 1102 S. 10TH STREET P.O. BOK 516 GOSHEN, IM\_46526

50 900116 U.S. GRANULES P.O. BOX 130 1433 WESTERN ATENUE PLYNOUTH, IM\_46563

53 900116 WALKER HFG. P.O. BOX 352 LIGONIER, IN\_46767

56 900116 YODER DIL P.O. BOK 10 ELKHART, IN\_46515

59 900116
ALBION WIRE
P.O. BOX 156
STATE ROAD 8 EAST
ALBION, IN\_46701

62 900116

MR. REECE PRATHER
AMCAST INDUSTRIAL CORPORATION
P.D. BOE 96
DATTON, ON\_\$5431

65 900116
ANGLIN COMPANIES, INC.
1402 N. HAIN
PORT WATNE, IN 46808

58 30011= ARLD SHITH RURAL ROUTP 5 COLUMBIA CITY, IN\_45725

71 900116
BPC MPG.
DIVISION OF BRISTOL CORP.
1755 N. OAK ROAD
PLYBOUTH, FN\_48553-0593

75 900116
BLUFFTON POWER PLANT
514 E. WASHINGTON
BLUFFTON, IN\_46714

76 900116 BOCK PRODUCTS 1901 W. HIZELY ELKHART, IN\_46517 74 900116
CHARLES V. CHAFFEE, PRESIDENT
HLUFFTON RUBBER CO., INC.
P.O. BOX 255
BLUFFTON, IN\_46714

78 900116 BRETAN CASTING 500 W BALTINORE BRENAN, IN 46506 79 900116
CRARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF MARSCO CORPORATION
HUNCLE, IN 47302

77 900116 LINDA J. SZEMBRUCH BORG-WARNER CORPORATION 200 SOUTH HICHIGAN AVENUE CHICAGO, IL\_60604

81 900116
DARYL LAMBERT
C AND R BARREL PLAYING CORP.
COLUMBIA CITY, IN\_46725

92 900116
CARTER LUMBER COMPANY
5625 PENDELTON
ANDERSON, IN\_46011

90 900116
BUNGE CORP. OF INDIANA
HIGHWAY 25
P.O. BOK 180
LOGANSPORE, IN\_45947-0186

900116
CREMICAL LEMMAN TANKLINES
5606 SOUTH U.S. HIGHWAY 421
WESTVILLE, IN\_46391

85 900116 CHEMSOLV, INC. 604 S. SCOTT P.O. BOX 1433 SOUTH BRUD, IN\_46624-1433 93 700116 CENTRE PROPERTIES, LTD. 19 S. LASALLE CHICAGO, TL\_60603

67 900116
CITY ENGINEER'S OFFICE
WATER POLLUTION CONTROL
CITY HALL
PORT WATHE, IN\_46803

08 900116 CHI WABASH CAST, INC. P.O. BOR 668 WABASH,IW\_46992 96 903116 TIMOTHY J. BLOOM CITY OF COLUMBIA CITY, CITY HALL CHAUNCEY STREET COLUMBIA CITY, IN\_46725

90 900116
DONALD S. WORLPEL
COLURLL/GEMERAL, INC.
P.O. BOX 329
PORT WAYNE, IM\_46801

91 900116
COLUBLL/GENERAL, THC.
J. HICHAEL O'HARA, 25Q.
P.O. BOT 2263
BARRETT, BARRETT 6 HCHAGHY
FORT WATHE, TH\_46801

89 900116 COACHMAN INDUSTRIES 601 K. REARDSLEY ELKNART, IN\_46515

93 900116
RICHARD D. TEEPLE
COOPER TIRE AND RUBBER COMPANY
PINDLAY, ON\_45640

94 900116 RICHARD D. TREPLE COOPER TIRE AND RUBBER COMPANY PINDLAY, ON\_45840 92 900116
CORCORDIA THEOLOGICAL SEMINARY
6600 N. CLINTON
PORT WAYNE, IN 46825

96 900116 COVER-ALL RENTAL SERVICE 3201 BROOKLYN AVENUE FORT WAYNE, IN\_46809 97 900116 CRAME EDMUND 550 WORTH BROADWAY BUTLER, IN\_46721 95 900116
RATHOND C. MARTER
DIVISION COUNSEL
CORNING GLASS WORKS
LEGAL DEPARTMENT
CORNING, NY\_14831

99 900116
CUSTARD INSURANCE ADJUSTERS, INC.
P.O. BOX 10479

100 900116

JOHN CANAN
VICE PRESIDENT, ENSINPERING

98 900116 FLICARETH BOTTSHEE AHELMANA CTS CORPORATION FORT WATHE, IN\_46852

102 900116
DAYCO CORPORATION
1200 W. HICHIGAN AVENUE
THREE RIVERS, MI\_89093

105 900116 DEKALB HOLDED PLASTICS U.S. HIGHWAY 6 WEST BUTLER, IN\_46721

108 900116 DIESTER HACHINE 1933 E. WAYNE STREET PORT WAYNE, IN\_46803

111 900116
DUGLASS CONSTRUCTION CO., INC.
4777 REED ROAD
FORT WAYNE, IN\_46815

114 900116 E-REC-TO P.O. BOX 846 HISHAWAKA, IW\_46544

117 900116
EDGERTON HETAL PRODUCTS, INC.
218 E. BEHENT
EDGERTON, ON\_43517

120 900116

HILES C. GERBERING
BARRETT, BARRETT & HCHAGHT
P.O. BOX 2263
ELECTRIC HOTORS & SPECIALTIES INC
FORT WATHE, IM\_46801

123 900116
ELMHURST BUS GARAGE
FORT WAYNE SCHOOL DISTRICT
6006 ARDHORE AVENUE
FORT WAYNE, IN\_46809

P.O. BOX 1388
DALTON POUNDRIES, INC.
WARSAW, IN\_46580

103 907116
LARRY L. TUCKER
DAYTON-WALTHER CORPORATION
600 BAST HIGHLAND AVENUE
NUNCIE DIVISION
NUNCIE, IN\_47303

106 900116 STEVEN L. ARTUSI, ESQ. CORPORATE COUNSEL DE PUY P.O. DOI 986 WARSAW,IN\_46580

109 900116
DOTCO COPPER AIR TOOLS
4030 STATE ROUTE 10
HICKSVILLE, ON\_43526

112 900116 DUTER INSTRUMENT 55 WARD WAKARUSA, IN\_46360

115 900116
ROBERT E. DRYDEN
ASSOCIATE COUNSEL, E-SYSTEMS THE.
P.O. DOX 660248
DALLAS,TI\_75266

118 900116
EDON MACHINE DIVISION
SIMPSON INDUSTRIES, INC.
W. INDIANA
EDON, ON\_93518

121 900116
BLEWART PRODUCTS CORP.
700 RAINBOW ROAD
GENEVA, IN\_46740

124 900116 EPCO PRODUCTS P.O. BOX 387 WEW MAYEN, IN\_46774 905 NORTH WEST HOULEVARD BLENART, IN\_46514

101 900116 CLEMENT A. REVETTI LEGAL COUNSEL P.O. BOX 1000 DAMA CORPORATION TOLEDO, ON\_43697

134 900116
DEKALB CENTRAL SCHOOL DISTRICT
P.O. BOK 503
AUBURN, IN\_46705

107 900116 WM. A. DIDIER S SONS 613 MESH STREET P.O. BOX 10746 PORT WAYNE, IN\_46853-0748

110 900116
NR. HORBERT P. STROHEL
HANDFACTURING ENGINEERING HANAGER
141 RAILROAD STREET
DOUGLAS COMPONENTS CORPORATION
BROWSON, HI\_49028

113 900116
DINANIC POWER CORPORATION
RURAL ROUTE 2
P.O. BOK 148
OSSIAN, IN\_46777

116 900116
KATHREN L. GOETZ, ATTORNEY
BAGLE-PICHER INDUSTRIES, INC.
P.O. BOX 779
CINCINNAPTI,ON\_45201

900116
ELCO INDUSTRIES, INC.
P.O. BOX 606
LOGANSPORT, IN\_45987

122 900116 CITY OF BLKHART CITY MUNICIPAL BUILDING 229 S. 2ND. PLKHART, IN 86515 EXACTO, INC. OF SOUTH BEND 1137 S. LAPAYETTE P.O. BOX 597 SOUTH BEND, IN\_44624

129 900116
PLEX STEEL INDUSTRIES, INC.
P.D. BOX 129
NEW PARIS, IN\_46553

132 900116
ROY 5. HOMAKOUSKI
FRANKLIN ELECTRIC COMPANY, INC.
400 EAST SPRING STREET
BLUFFTON, IN\_46714

135 900116 G.C.G. BHTERPRISES 2204 LIBERTY DRIVE HISHAWAKA, IN\_46544

136 900116
THOMAS H. ARMSTRONG
COUNSEL-ENVIRONMENTAL ISSUES
GENERAL ELECTRIC COMPANY
PAIRPIELD, CT\_06431

141 900116
DAVID C. LEE
STATE GENERAL COUNSEL & SEC.
P.O. BOX 407
GENERAL TELEPHONE COMPANY
WESTPIELD, IN\_46704

144 900116
JOHN ROSS
VICE PRESIDENT - E.P.A.
111 EAST BROAD STREET
GRIPCO PASTENERS DIVISION OF MITE
SOUTH VHITELT, IN\_46767

147 900116
REMDRICKSON TANDEN CORP.
BOLER INVESTMENTS, INC.
P.O. BOX 927
KENDALLVILLE, IN\_46755

150 900116
HOOK IND. SALES
2731 BROOKLYN AVENUE
PORT WAYNE, IN\_46804

LAUREN H. HORISZNY CORPORATE COUNSEL 2655 COOLIDGE EX-CELL-O CORP. TROY, NI\_46084

130 900116
FORE WAYNE AIR SERVICE
(RA) JOHN DILLET
4021 AIR ST. BAERPIELD
FORT WAYNE, IN\_46809

133 900116
PREEMONT MPG.
DIVISION OF SIMPSON IND. INC.
S. TILLOTSON
PREMONT, IN\_46737

136 900116
GASGLINE EQUIPMENT SEV. CO., INC.
P.O. DOX 10474
FORT WATHE, IN\_46652

139 900116
D. W. HOHRHAM
HAWAGER-ENVIRONMENTAL PROGRAMS
P.O. BOX 2230
GRHERAL ELECTRIC COMPANY
PORY WAYNE, IN\_46801

142 900116
GENEVA SCREW MACHINE PRODUCTS INC
G.S. 27 M.
P.O. BOX 241
ROUTE 1
GENEVA, IN\_46740

145 900116
MAGREMAN CONSTRUCTION CORP.
501 W. WASHINGTON BOULEVARD
PORT WATHE, IN\_46802

148 900116 HILLSDALE TOOL 6 HFG. CO. 135 E. SOUTH HILLSDALE, HI\_49242

151 900116 HOOVER DRAINAGE GRINN ROAD HUNTINGTON, IN 46750 ESSEX INTERNATIONAL, INC.
UNITED PECHNOLOGY CORPORATION
UNITED TECHNOLOGY SUILDING
HARTFORD, CT\_06101

128 900116 FLATLOW, INC. 1810 CIRCLE 580TH BEND, IN\_46628

131 900116
FORT WATHE WATER
POLLUTION CONTROL PLANT
2001 DUENGER AVENUE
FORT WATHE, IN\_46803

900116 g-G SERVICE CO. GLENDROOK SQUARE SHOPPING CENTER PORT WAYNE, IN\_

00116
OATES CHEVROLET CORP.
401 5. LAPAVETTE
50UTH BEND, IN\_46601

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143 900116 GENDYA, INC. 7034 E. COURT DAVISON, HI\_48423

146 900116 FOR HARGETT FORENAUP CORP. LÍQUÍD AND BULK TANK DIVISION PO. BOE 660 PORT MANA, IN\_46601

149 900116 HOLMES AND COMPANY BP7 EAST ELLSWORTH P,O- BOK 370 COLUMBIA CITY, IN\_46725 153 900116
ITT AEROSPACE/OPTICAL DIVISION
DIVISION OF ITT CORP.
p.O. BOX 3700
PORT NATHE, IN\_#6801-3701

156 900116
INDIANA DIE NOLDING
DIVISION OF NAMBET INDUSTRIES INC
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FORT NAMBE, IN\_46018-2209

159 900116
JAHESON CORP. OF INDIANA
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REIDALLVILLE, IJ\_46755-2015

162 900116
JOSAN HANUPACTURING COMPANY
1500 EAST SECOND STREET
HICHIGAN, IN\_46360

165 900116 KREAGER BROTHFRS EXCAVATING RURAL ROUTE 1 CROMMELL, TH\_46732

168 900|16 KERR GLASS NAMPPACTURING CORP. 924 EAST CENTER BUNKIRK, IN\_47336

171 900116 (RA) GENE LOPSMIRE #01 W. PAIRPAK FORT WAYNE, IN\_M6807

174 900116 LINCOLN HANGPACTURING COMPANY INC 7.0. BOX 1229 FORT WAYNE, IN\_46801

177 900116 LYDELL, INC., ELASTONER PRODUCTS GROUP P.O. BOX 29 154 900116 IMCO, INC. P.O. BOX 444 HUNTINGTON,IN\_46750

157 900116
INDUSTRIAL PUBL OILS, INC.
1702 S. PAIRPIBLD AVENUE
FORT WAYNE, IN\_46804

160 900116 JIM RELLY BUICK, INC. 1819 S. CALHOUN PORT WATNE, IN\_46804

163 900116
JOT NAMUPACTURING COMPANY
301 GRANT STREET
PITTSBURGH, PA\_15219

166 900116 ROOMTZ EQUIPMENT 6946 LILAC ROAD PLYMOUTH, IN\_46563

169 900116
LARDEN CORP.
RENER R. MAUNITURET
11 S. MERIDIAN ST. SUIPE 1313
BARNES AND THORNOURG
INDIANAPOLIS, IN\_46204

172 900116
LINE CITY MPG. CO., INC.
1470 ETMA AVENUE
P.O. BOE 509
MUNTINGTON, IM\_46750-3640

175 900116 LOBDELL-EMERY MFG. CO. 10850 17TH STREET ARGOS,[M\_46501-9703

176 900116
ZANKK, INC.
100 PROGRESS WAY W.
AVILLA, IN\_46710

152 900116
THOMAS L. ALDRICH
ASSISTANT GENERAL COUNSEL
2700 SANDERS ROAD
HOUSEHOLD HANDFACTURING, INC.
PROSPECT HEIGHTS, IL\_60070

155 900116
INDIANA ATR NATIONAL GUARD
BARR FIELD
FORT WATME, IN\_W609

158 900116
INTERNATIONAL HARVESTER COMPANY
2701 COLISEUM BOULEVARD
P.O. BOX 596
FORT MATNE, IN 46801

161 900116
JOHNSON PRODUCTS
2100 STRRLING AVENUE
ELKHART, IN\_46516

164 900116 R. MART DISTRIBUTION CENTER P.D. BOX 359 FORT WANNE, IN\_46801

167 900116

KIPCHEN QUIP, INC.
WILLIAN L. SWEET, JR.
P.O. BOX 2263
BARRETT, BARRETT 5 MCNAGNY
FORT MATME, IN\_46801

170 900116
RUPUS H. CRAIG, DIRECTOR OF LAY
MACHILLAN BLOEDAL, INC.
P.D. BOX 366
PINE HILL, AL\_36769

173 900116 LIMESTONE PRODUCTS, INC. P.O. BOX 618 PORTLAND, IN\_4/371

176 907116
LOCK JOINT THE COMPANY, INC.
1400 RIVERSIDE DAIVE
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180 900116
THOMAS H. HAPHER, ESQ.
HAGNAVOR CONSUSHER ELECTRIC COP.O. BOX 14810
HORTH AMERICAN PHILIPS COMPANY
KNOXVILLE, TM\_37914

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183 900116
NARTIN OIL
4501 127TH ALSIP
BLUE ISLAND, IL\_60406

166 900116
HCCORD MEAT TRANSFER CORP.
500 W. MARRISON STREET
PLYNOUTH, IM\_46563-1324

169 900116
HEAUS SERVICE, INC.
(RA) CT CORP.
1 M. CAPITAL AVENUE
INDIANAPOLIS, IN\_46240

192 900116
HISHAWAKA CITY SCHOOLS
1402 S. HAIN
HISHAWAKA, IU\_46544

195 900116
HIERS SEPTIC SERVICE
ROUTE 3
LIGOUIER, IN\_46767

198 900116
NATIONAL HEAT TREATING CORP.
1621 S. HONROE
FORT WAYNE, IN\_46803

SOUTH BEND, IN\_46624

181 900116
D.T. CARLTON
NAGNAVOR GOV. 6 INDUSTRIAL
1313 PRODUCTION ROAD
ELECTRONICS COMPANY
FORT WAYNE, IN\_46808

184 900116 STRPHEN T. BENIS ASSISTANT CORPORATE COUNSEL 21001 FAN BORN ROAD MASOD INDUSTRIES, INC. TAYLOR, NI\_40180

187 900116
MCDOWELL ENTERPRISES, INC.
JAMES W. WOODSWALL, ESQ.
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WARRICE, WEAVER, 6 BOYN
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190 900116 HEEK HACK, INC. 6529 HAPLEDOWNS DRIVE FORT WATHE, IN\_46815

193 900116 WOWSAWTO 910 GENDER STREET LIGOWIER, IW\_46767

196 900116 MAIS FOOD RURAL ROUTE 5 PORTLAND, IW\_47371

199 900116
MORPOLE 6 WESTERN RAILTWAY CO.
8111 WELSON ROAD
PORT WAYNE, IN\_46803

202 900116
NORTHERN INDIANA PUBLIC SRYS. CO
5265 NOLHMAN AVENUE
HANNOND, IN\_46320

179 900116
ZOLLMER CORPORATION
HILES 2. GERBERDING
P.O. BOX 2263
BARRETT, BARRETT 6 HCNAGNY
PORT WATHE, IN\_46801

132 900116 MAPLENDOD SHELL SERVICE 6132 STELLHORN ROAD PORT WAYNE, IN\_46815

135 900116
HATERIALS HANDLING EQUIPMENT CORP
7433 US REGNEAT 30 E.
FORT WATHE, IN\_46803

158 900116
W.A. AILES
VICE PRESIDENT-TREASURER
909 M. LAPATETTE STREET
MCGILL HANDPACTURING CO. INC.,
VALPARAISO, IN\_46383

191 900116

METALLURGICAL PROCESSING, INC.
3715 B. WASHINGTON BOULEVARD
P.O. HOX 10842

FORT WATHE, IN\_46854-0842

134 900116
MOORE BUSINESS FORMS
WEST MILL
ANGOLA, IN\_46703

197 900116
R.H. RIVETNA, HANAGER
ENVIRONMENTAL ENGINEERING
8101 MEST HIGGINS ROAD
NATIONAL CAN CORP.
CHICAGO, IN\_60631

200 900116 NORTH AMERICAN VAN LINES, INC. 5001 U.S. HIGHWAY 30 W. FORT MAYNE,IN\_46418

204 900116 ONTARIO FORGE CORPORATION 205 900115 ORTON-MCCULLOUGH CRANE 2); 9))116 0.F.C. MEDICAL SYSTEMS Onterio Fage Corporation
1200 MEST JACKSON STREET
P.O. BOIL 2757
HUHCIE, IN\_47303

207 900116 PHD Co. 4763 N. U.S. 24 E. NUNTINGTON, IN\_46750-9617

210 900116
POORMAN'S MEATING AND AIR
CONDITIONAING SERVICE, INC.
1417 MARTIN
FORTY WATHE, IN\_46802

213 900116
R.J. RINA, SUPERVISOR
ENVIRONMENTAL APPAIRS
P.O. BOX 1348
PANNANDLE EASTERN PIPELINE CO.
KANSAS CITY, NO\_64141

216 900116
HONICA H. PORRNAN, SR. ATTORNET
R.R. DONNELLEY 6 SONS
2223 HARTIN LUTHER KING DRIVE
CHICAGO,IL\_60616

219 900116 RENCO OIL P.O. BOX 610 MISHAWAKA, IN\_46544

222 900116 ROPPE RUBBER CORP. 101 INDUSTRIAL DRIVE ANGOLA, IN\_46703-1045

225 900116 SEANCO 503 E. BROAD SOUTH WHITLEY,IN\_46787

228 900116 SHELL CAR WASH 1001 W. 7TH AUBURN, IN 46706 Orton-McCullough Crane
P.O. BOX 846
HISHAHAKA, IN\_46544

20A 700116
DAINE W. SKINNER
ASSISTANT RISK HANAGER
P.O. BOY 943
PHILLIPS INDUSTRIES, INC.
DAYTON, ON\_45401

211 900116
POWER PLANT SERVICE, INC.
2010 LAKEVIEW BOAD
PORT WAYNE, IM\_46808-3922

214 900116 ROWALD R. RICHET PRECISION PLASTICS, INC. P.O. BOX 329 COLUMBIA CITY, IN\_46725

217 900116 RACO, INC. NARVEY RUSSELL, INC. P.O. BOX 4002 HISHAWAKA, IN\_46755

220 900116 REBSBERGER OIL 1604 ROPEL SOUTH BEND, IN\_46628

223 900116 RYDER TRUCK RENTAL FORT WAYNE LEASING P.O. BOY 419 FORT WAYNE, IN 46801

226 900116 SMAMBAN 6 CO., INC. 2531 BRENER DRIVE PORT WAYNE, IN\_46803

229 700116 SHELLER GLOBE P.O. BOX 962 TOLEDO, OH\_43697 OEC. Medical Systems
501 ARBONNE ROAD
WARSAW, IN\_46580

206 900115
PAR-TEE COMPANT, INC.
STATE ROAD ONE
SPENCERVILLE, IN\_46746

209 900116
PLYMOUTH COMMUNITY SCHOOLS
701 EAST BERKELEY STREET
PLYMOUTH, IN\_46563

212 900116
PRAIRIE VIEW LANDFILL
P.O. BOX 128
WYAPP,IM\_46595

215 900116 PRINCO, INC. P.O. BOE 9782 FORT WATHE, IN\_46899

216 900116 RECLAIMER, INC. P.O. BOX 610 HISHAWAKA,IN\_46755

221 900116 ROCEWELL INTERNATIONAL 1001 N. CULVER ROAD KNOT, IN\_46534

224 900116 RYDER TRUCK RENTAL S LEASING DISTRICT OFFICE 5225 NEW HAVEN AVENUE PORT WAYNE, IN\_46803

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WABASH FIBRE BOX CO.
WESTOW PAPER AND HPG. CO.
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FORT WAYNE, IN\_46809

264 900116 JAN WATERS & ROGERS 7603 WELFO ROAD PORT WATER, IM\_46803

267 900116
WATHE METAL PROTECTION CO.
1511 WARPSH AVENUE
FORT WATHE, IN\_46603~2146

270 900116
WOODALL
10261 S. INDIAN LAKE BOULEVARD
INDIANAPOLIS, IN\_46236

259 900116 VULCRAFT COUNTY ROAD 60 ST. JOB, IN\_46765

262 900116 WABASH, INC. 411 B. SOUTH HUNTINGTON, IN\_

265 900116 JOE WATKINS RURAL ROUTE 4 PORT WATME, IW\_46819

268 900116
WATHE RECLAMATION & RECYCLING INC
LARRY BROCKNAW
P.O. BOY 467
DANIEL DRIVE
COLUMBIA CITY, IN\_46725

271 900116 WORLD COLOR PRESS CREMICAL PLATE CORP. P.O. BOX 1246 EPFINGRAM, IL\_62401 257 900116 VALLEY MACHINE PRODUCTS 1840 BORNEMAN AVENUE ELKHART, IN 46517

250 900116
WABASH ALLOYS, INC.
DIVISION OF OGDEN CORP.
P.O. BOX 466
OLD U.S. 24 M.
WABASH, IN\_46992-0466

263 900116 WALBRED TOOL 1935 W. LUSHER ELEHART, IN\_46517

266 900116
WATHE HOME EQUIPMENT
DIVISION OF SCOTT 5 FETZER
801 3LASGON AVENUE
FORT WATHE, IN\_46803-1344

269 900116 WHITLEY PRODUCTS 1403 STANLEY DRIVE PLYNOUTH, IN\_46563

272 900116 NOLDE CORPORATION 6932 SETTESBURG PIKE FORT WATNE, IN\_46804

# ATTACHMENT III

# PROPOSED PLAN

# WAYNE RECLAMATION AND RECYCLING SITE COLUMBIA CITY, INDIANA

# WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

#### INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

Peabody Library 203 N. Main Street Columbia City, Indiana 46725

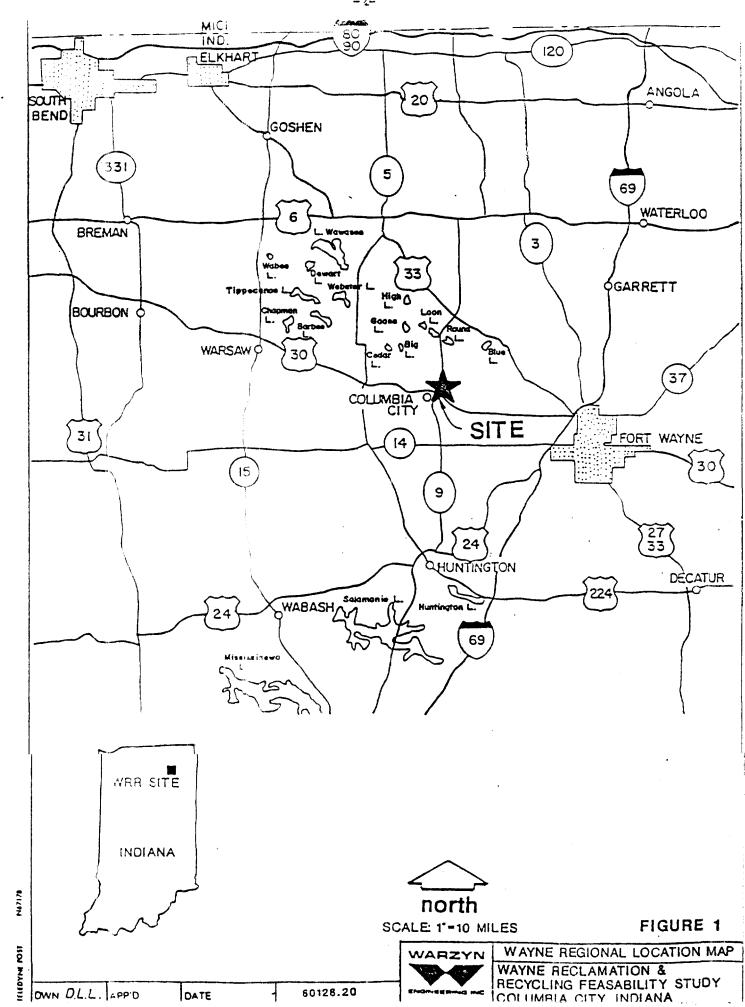
Columbia City Hall 211 S. Chauncey Street Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SITE BACKGROUND

#### Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



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In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

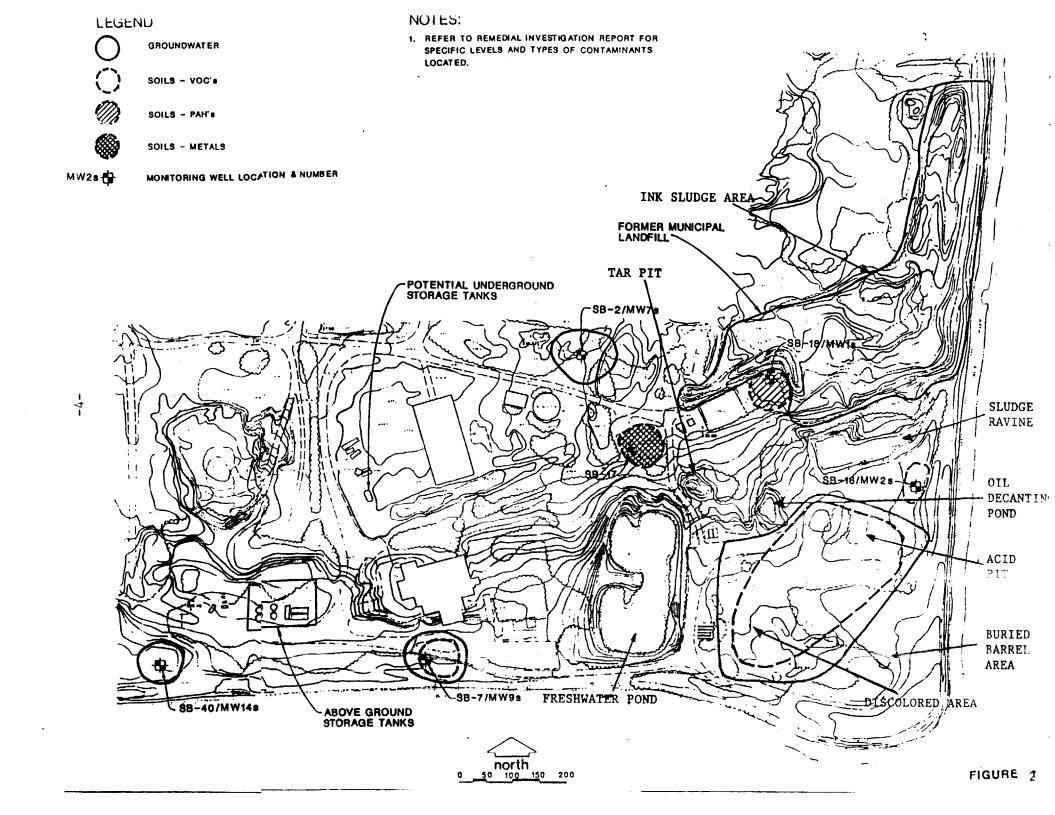
In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

o Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).



- The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- o The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- o Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

#### Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

#### Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

#### Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2 x  $10^{-4}$ . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

#### Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of  $3 \times 10^{-2}$ . This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

#### SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

# Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migration of subsurface soil contaminants to the groundwater

#### Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

## Municipal Landfill

o Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

# Surface and Subsurface Tanks and Contents

o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

#### Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (OLM), for each alternative are also provided. All costs and implementation times are estimated.

### Alternative 1: NO ACTION

Capital Cost: \$0
Annual O&M Cost: \$0
Present Worth: \$0
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,329,630
Annual O&M Cost: \$ 228,500
Present Worth: \$5,483,700
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,248,230
Annual O&M Cost: \$ 236,700
Present Worth: \$5,110,848
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,306,875
Annual O&M Cost: \$ 291,000
Present Worth: \$5,582,499
Time to Implement: 15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$7,988,170
Annual O&M Cost: \$ 279,000
Present Worth: \$9,927,114
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled onsite. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/COVERING PAH-CONTAMINATED SOILS/CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/DEED RESTRICTIONS/MONITORING/CAPPING MUNICIPAL LANDFILL/REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,571,980
Annual O&M Cost: \$298,500
Present Worth: \$6,385,960
Time to Implement: 30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

# EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

#### <u>Analysis</u>

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARS is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

#### TABLE 1

#### GLOSSARY OF THE NINE CRITERIA

Community Acceptance will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.

Compliance with ARARs

addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.

Cost.

includes capital and operation and maintenance costs.

Implementability

is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

Long-term Effectiveness and Permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

Overall
Protection of
Human Health and
the Environment

addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

Reduction of Toxicity, Mobility, and Volume is the anticipated performance of the treatment technologies a remedy may employ.

Snort-term Effectiveness involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

State Acceptance indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term OAM.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

## Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. Based on the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

#### THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall 112 South Chauncey Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431 between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall 112 South Chauncey Columbia City, IN Peabody Library 203 North Main Columbia City, IN.



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